

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:

SHAPES/ARCH HOLDINGS L.L.C., et al.,

Debtors.

Chapter 11

Case No. 08-14631 (GMB)
(Jointly Administered)

**REQUEST FOR ALLOWANCE AND PAYMENT
OF ADMINISTRATIVE EXPENSE CLAIM**

Metal Management Northeast, Inc. ("Metal Management"), by and through its undersigned counsel, hereby submits this Request for Allowance and Payment of Administrative Expense Claim (the "Demand") pursuant to 11 U.S.C. § 503(b)(9) and the Court's Order establishing the administrative expense bar date. In support of the Demand, Metal Management states as follows:

1. On March 16, 2008 (the "Petition Date"), the above-captioned Debtors each filed a voluntary petition for relief under chapter 11, title 11 of the United States Code.
2. Before the Petition Date, Metal Management sold goods in the ordinary course of business to Debtor Shapes L.L.C. a/k/a Aluminum Shapes ("Shapes"). Certain of those goods, as identified on Exhibit A attached hereto, were sold by Metal Management and delivered to Shapes within twenty (20) days of the Petition Date. The goods so delivered, identified on Exhibit A, have a value of \$89,030.84 (the § 503(b)(9) Claim).
3. To date, Shapes has failed either to return such goods to Metal Management or to pay Metal Management for the value of such goods.

4. Because the goods sold and delivered were necessary for Shapes to operate its business, Metal Management has provided a benefit to the estate for which it has not been compensated.

5. Pursuant to 11 U.S.C. § 503(b)(9), Metal Management is entitled to an allowed administrative expense claim in the amount of \$89,030.84 and to prompt payment of same.

WHEREFORE, Metal Management demands payment of the § 503(b)(9) Claim.

Dated: June 30, 2008

**TRENK, DiPASQUALE, WEBSTER,
DELLA FERA & SODONO, P.C.**
347 Mt. Pleasant Ave., 3rd Floor
West Orange, NJ 07052
Phone: (973) 243-8600
Fax:: (973) 243-8677
Attorneys for Metal Management Northeast, Inc.

By: /s/ Sam Della Fera, Jr.
Sam Della Fera, Jr.

EXHIBIT A



INVOICE

MTLM NORTHEAST - CT
2430 PAYSHERE CIRCLE
CHICAGO IL 60661
PH: (973) 344-4570

ACCOUNT NO. ALUM01

NOTICE DATE 02/26/08

SOLD TO

SHIP TO

ALUMINUM SHAPES
P.O. BOX C90397
9000 RIVER ROAD
DELAIR

ALUMINUM SHAPES

, NJ 08110

DELAIR

, NJ

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005

INVOICE DATE	INVOICE NUMBER	CUSTOMER ORDER NO.	OUR ORDER NO.	F.O.B	TERMS			
02/26/08	117079	793385	88268C	DEL'D-WE PAY FR	NET 30 DAYS			
CAR INITIAL AND NO.	DESCRIPTION	WT. CODE	GROSS LBS.	TARE	NET LBS.	BILLING WT.	PRICE	AMOUNT

CRCL8 18817 327066	O	30866	248	30618	1.0300 LB			
ALUMINUM, 6063, 10/10				30618.0000 LB	31536.54			
CRCL8 18817 327067	O	1640	2	1638	1.0200 LB			
6061 PLATE				1638.0000 LB	1670.76			
CRCL8 18817 327068	O	9182	212	8970	1.0700 LB			
6061 CLIPS				8970.0000 LB	9597.90			

INVOICE TOTAL = \$ 42805.20

WT. CODE:

- O Indicates SHIPPED WEIGHT
- M Indicates MILL WEIGHT OR CONSUMER WEIGHT

SELLER REPRESENTS THAT IT HAS FULLY COMPLIED WITH THE PROVISIONS OF THE FAIR LABOR STANDARDS ACT OF 1938, AS AMENDED.

Remit Payment To:

Circle 8 Logistics, Inc.
P.O. Box 2457
Northlake, IL 60164

Circle 8

Logistics

Ph: 800-518-4287 Fax: 708-343-7026

Bill TO

Metal Management - North Have
234 Universal Dr
North Haven CT 06473

Invoice # 60671
Invoice Date 3/4/2008
Shipment Date 2/26/2008
Load # 65260
PO# Delair, NJ

Line Haul

Origin	North Haven, CT	Destination	Delair, NJ
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Load Information:

S/C Warehouse	Location	Product	Weight	Pieces	Bol#
S	Metal Management - North Haven, CT	baled metal			
C	Metal Shapes	Delair, NJ			

Invoice Notes:

Freight Charges

Line Haul	\$450.00
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	Qty	Rate	
Extra Stops	0	\$0.00	\$0.00

Misc Fee Notes:

Misc Fee \$0.00
Invoice Total **\$450.00**

Payment Terms: Net 15 days from invoice date

Please include invoice number with check

Original — Not Negotiable

UNIFORM STRAIGHT BILL OF LADING

Shipper's No. 19580

Company

Agent's No. 18817

RECEIVED subject to the classification and tariffs in effect on the date of the issue of this Bill of Lading,

at **NORTH HAVEN, CONNECTICUT 06473** 20 from **METAL MANAGEMENT CONNECTICUT, INC.**

The property described below, in apparent good order, except as noted (contents and conditions of contents of package unknown), marked, packaged and sealed as indicated below, which said company (the word company being understood throughout this contract as meaning any person or corporation) in possession of the property under the contract, agrees to carry to its usual place of delivery at said destination, if on its own road or its own water line; otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property that every service to be performed hereunder shall be subject to all the conditions not prohibited by law, whether printed or written, herein contained, including the conditions on back hereof, which are hereby agreed to by the shipper and accepted for himself and his assigns.

Consigned to **Aluminum Shapes Bond # 343939** (Mail or street address of consignee - For purpose of notification only.)

Destination **9000 River Road** State of **Delaware** Zip Code **19739** County of **Delaware**

Route **Delaware, NJ**

Delivering Carrier **Circle 8** Car Initial **BOND** Car No. **17387**

No. Packages	Description of Articles, Special Marks, and Exceptions	Weight (Sub. to Car)	Class or Rate	Check Column	Subject to Section 7 of conditions of this bill of lading, to be delivered to the consignee without recourse on the part of the shipper, the shipper shall sign the following statement: The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.
1 T/L	Metal Scrap (Extrusion # 61 plate/s) 6	41688			
	See Packing List Details T	462			
	Delivery Date 2/27/08 from 73 N	41226			
	Delivery # 793385 Contact Kyle				
	Seal # S/52303288				
	2/26/08				
	Uster Man				
	PO# 793385 ISO# 88268				

* If the shipment moves between two ports by carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."	GROSS	Per (The signature here acknowledges only the amount prepaid.)
NOTE: Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding:	TARE	Charge Advanced:
* The fibre boxes used for this shipment conform to the specifications set forth in the box maker's certificate thereon and all other requirements of Uniform Freight Classification.	NET	
* Shippers' imprint in ink of stamp, note pad or bill of lading approved by the Interstate Commerce Commission.		

Metal Management Connecticut, Inc. Shipper, Per **234 Universal Drive North Haven, CT 06473** Agent, Per **1**

Permanent post-office address of shipper:

2/26/08 (This Bill of lading is to be signed by the shipper and agent of the carrier issuing same.)



INVOICE

MTLM- NORTHEAST/NAPORA
2180 PAYSPIRE CIRCLE
CHICAGO IL 60661
PH: (973) 344-4570

ACCOUNT NO. ALUM01

NOTICE DATE 02/28/08

SOLD TO

SHIP TO

ALUMINUM SHAPES
P.O. BOX C90397
9000 RIVER ROAD
DELAIR

, NJ 08110

ALUMINUM SHAPES
9000 RIVER ROAD

DELAIR

, NJ 08110

01

005

INVOICE DATE	INVOICE NUMBER	CUSTOMER ORDER NO.	OUR ORDER NO.	F.O.B.	TERMS:				
02/28/08	110207	793319	84743N	DEL'D-WE PAY FR	NET 30 DAYS				
CAR INITIAL AND NO.	DESCRIPTION		WT. CODE	GROSS LBS.	TARE	NET LBS.	BILING WT.	PRICE	AMOUNT

FIRST 008	238037	O	35507	1	35506		1.0400 LB	
	ALUMINUM, 6063, 10/10				35506.0000 LB		36926.24	
FIRST 008	238038	O	8455	1	8454		1.1000 LB	
	BARE				8454.0000 LB		9299.40	

INVOICE TOTAL = \$ 46225.64

WT. CODE:

O Indicates SHIPPED WEIGHT

M Indicates MILL WEIGHT OR CONSUMER WEIGHT

SELLER REPRESENTS THAT IT HAS FULLY COMPLIED WITH THE PROVISIONS OF THE FAIR LABOR STANDARDS ACT OF 1938, AS AMENDED.

Invoice Number: 1080721163

Invoice Date: April 17, 2008



Remit To:

P.O. Box 9121
Minneapolis, MN 55480-9121

Bill-to:

C1226426

**C. H. ROBINSON
Worldwide, Inc.**

ATTN: ACCOUNTS PAYABLE
SIMS METAL MANAGEMENT - NEWARK
FOOT OF HAWKINS STREET
P.O.BOX 5158
NEWARK NJ 07105

Balance Due: \$475.00

Payment Due: March 29, 2008

Mode: V

CHR Load: 49586305

Branch Code: 0801 Chicago Central

SHIPMENT DETAIL

Type	Location	Date	Product	Weight	Pieces
P	Metal Management Foot of Hawkins Street Newark, NJ 07105	02/28/2008	metal management	42000 lbs	0 PLT
D	Aluminum Shapes 9000 River Road Delair, NJ 08110	02/28/2008	metal management	42000 lbs	0 PLT

RATES AND ACCESSORIALS

Description	Type	Units	Per Unit	Total
Line Haul	Flat rate	1	\$475.00	\$475.00

Sub-Total: \$475.00
Payment Received: \$0.00
Balance Due: \$475.00

238037

C.H. Robinson Company, Inc., 1840 N Marcey, Chicago, IL 60614

Fed Tax ID 41-1956721, MC 384859

Please reference invoice 1080721163 when remitting payment.

If you have questions regarding this invoice or your account, please call David Young at 312-944-7277.

Deposit of a check for less than full amount of this invoice shall not constitute an accord and satisfaction nor a full settlement of this invoice without prior written agreement. The terms and conditions shown above constitute the complete agreement of the parties, and may only be altered in a written agreement signed by both parties.

Company	Agent's No.	205689
Company's no.		

RECEIVED, subject to the classification and tariffs in effect on the date of the issue of this Bill of Lading.

NEWARK, NEW JERSEY 07105

20

from

METAL MANAGEMENT NORTHEAST, INC.

Consigned to First class 008

Destination: Aluminum shapes

Route.

Delivering Carrier
Ct Robinson

Car initial.

Car No. _____

No. Packages	Description of Articles, Special Marks, and Exceptions	* Weight (Sub. to Car.)	Class or Rate	Check Column
33	10/10 756	35506		
8	6063 Bare 756	8454		
	2/28/08			
	Under Memo			
	Seal # 3489509	Time IN 7:00 AM		
	Del Date 2/29/08	Time out 12:30 PM		
	PO#	ISO#		

Subject to Section 7 of conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:

The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of Consignor)

If charges are to be prepaid, write or stamp here, "To be Prepaid."

Received \$ _____

To apply in prepayment of the charges on the property described hereon.

Agent or Cashier.

Per (The signature here acknowledges only the amount prepaid.)

Charge Advanced:

GROSS 43960

TARE —

NET 43960

If the shipment moves between two ports by carrier by water, the law requires that the bill of lading state whether it is "carrier's or shipper's weight."

NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding.

The fire boxes used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of Uniform Freight Classification.

Class of Goods: _____

per _____

Metal Management Northeast, Inc. Shipper Per **Newark, NJ 07105** Agent, Per 

Permanent post-office address of shipper,

(This Bill of lading is to be signed by the shipper and agent of the carrier (issuing same).)